## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF MISSOURI

PURZEL VIDEO GMBH,	)
Plaintiff,	)
V.	) Case No. 4:12-cv-02292-AGF
DOES 1-91,	) ) JURY TRIAL DEMANDED
Defendants.	)
	)

## PLAINTIFF'S MOTION FOR EXTENSION OF TIME TO NAME AND SERVE DEFENDANTS PURSUANT TO FED. R. CIV. P. 4(m)

Plaintiff Purzel Video GmbH hereby files this Motion for Extension of Time to Name and Serve Defendants Pursuant to Federal Rule of Civil Procedure Rule 4(m). Good cause and reasonable basis exists as to why Plaintiff has not yet named and served the Defendants in this case. First, Plaintiff has not yet received the identifying information for many of the Doe Defendants. Second, the Defendants have not been prejudiced by any delay in naming and serving them and will not be prejudiced by an extension.

For the reasons set forth herein and in its Memorandum in Support, Plaintiff requests that the Court extend the time by which Plaintiff must name and serve the Defendants in this case for a reasonable amount of time (*i.e.*, to October 10, 2013, an additional 90 days from July 12, 2013).

Dated: July 11, 2013

Respectfully submitted, Purzel Video GmbH

By its Attorneys, SIMMONS BROWDER GIANARIS ANGELIDES & BARNERD LLC Case: 4:12-cv-02292-AGF Doc. #: 26 Filed: 07/11/13 Page: 2 of 2 PageID #: 152

By: /s/ Paul A. Lesko

Paul A. Lesko One Court Street Alton, IL 62002 Ph: 618.259.2222

Fax: 618.259.2221

plesko@simmonsfirm.com

Counsel for Plaintiff Purzel Video GmbH

## **CERTIFICATE OF SERVICE**

The undersigned certifies that on this 11<sup>th</sup> day of July, 2013, a true and accurate copy of the foregoing was filed via the Court's Electronic Case Filing system ("ECF") upon all counsel of record:

/s/ Paul A. Lesko

Paul A. Lesko - Simmons, Browder, Gianaris, Angelides & Barnerd, LLC